



State of Ohio Environmental Protection Agency

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Bob Taft, Governor  
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August 27, 2004

Mr. William J. Taylor  
U.S. Department of Energy, Fernald Area Office  
P.O. Box 538705  
Cincinnati, OH 45253-8705

BERNARD  
OG E-1072  
04 AUG 30 P 12:16  
LE: 6446.45  
BRARY:

**RE: DISAPPROVAL OF IMPLEMENTATION PLAN FOR D&D OF THE OU1 COMPLEX**

Dear Mr. Taylor:

This letter provides Ohio Environmental Protection Agency comments on the Implementation Plan for the Decontamination and Dismantlement of the Operable Unit 1 Complex.

We found this plan to be long on verbiage and short on details. The frequent references to subcontractor specifications despite the intent for Fluor Fernald to self-perform lends support to our contention that this Plan was cobbled together from previous Implementation Plans. That being said, we realize that some of the staff who write these Plans have transitioned to other duties.

Our major concern with this Plan is dismantling the Railcar Loadout Building while there still remains a very large quantity of material to be shipped by rail. It is our understanding the soil stockpile SP-7 now holds 70,000 cubic yards of above-WAC material and that it continues to grow daily. It will take roughly four months to load this material onto rail cars for shipping. We are confident that methods can be devised to load the cars. We are less confident that this material can be loaded efficiently, safely and with a minimum of air-borne dispersion. The existing system of cranes for removal and replacement of the rail car lids has to our knowledge worked flawlessly. Furthermore, the existing Railcar Loadout Building already has a functioning air monitoring system.


In responding to our comment, the Soils Project should be consulted to address the details of their planned loadout of SP-7. We are interested especially in the following: the method of loading the cars (will excavators or front-end loaders be used), plans for project-specific air monitoring, and the methods of placing, removing and storing the railcar lids. In addition, the D&D Project should discuss the possibility of concurrent loadout of trains using the existing infrastructure while D&D of adjacent structures (dryers, gas cleaning building, etc.)

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proceeds.

Should you have any questions, please contact Tom Ontko or me.

Sincerely,

  
For

Thomas A. Schneider  
Fernald Project Manager  
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA  
Mark Shupe, GeoTrans, Inc.  
Michelle Cullerton, Tetra Tech EM Inc.  
Ruth Vandergrift, ODH

## Ohio EPA comments on the Operable Unit 1 Complex D&amp;D implementation Plan

- 1) Commenting Organization: Ohio EPA Commentor: OFFO  
Section #: Pg #: 29 Line #: Code:  
Comment: There is no Figure 4-1 or page 29/30 in any copies of this Plan provided to Ohio EPA.
- 2) Commenting Organization: Ohio EPA Commentor: OFFO  
Section #: 2.4 Pg #: 12 Line #: 2nd from last paragraph Code: c  
Comment: The text states that air emissions modeling will be performed using data collected from a final radiological survey just prior to commencing D&D. Provide the survey results and the modeled predictions to Ohio EPA.
- 3) Commenting Organization: Ohio EPA Commentor: OFFO  
Section #: 2.4 Pg #: 12 Line #: 2nd from last paragraph Code: c  
Comment: The text states, "Based on a future review of computer modeling results, it is anticipated that no supplemental air monitoring will be required for the OU1 Complex D&D activities." We agree that it is likely that modeling will predict that this project will cause negligible air emissions. That being said, there is already in place an effective air monitoring program for the WPRAP. What is the schedule for decommissioning the WPRAP project-specific air monitors? Ohio EPA expects this air monitoring to continue until the end of the D&D Project.
- 4) Commenting Organization: Ohio EPA Commentor: OFFO  
Section #: Appendix A Pg #: Line #: Code: c  
Comment: This Plan does not address sampling of concrete and other porous surfaces for Tc-99 to verify compliance with the Operable Unit 5 WAC for Tc-99. A Plan should be developed to sample concrete. The floors of the MHB and the load-out bins are the most likely surfaces to be contaminated with Tc-99. Other areas should be evaluated based on process knowledge for the potential to be contaminated with Tc-99. Cores should be obtained and Tc-99 activities should be measured as a function of depth below the surface of the concrete. The data should be used to calculate the WPRAP D&D Projects total Tc-99 mass-loading to the OSDF. The concrete should not be placed in the OSDF until after WAO has determined that the total TC-99 mass including the contribution from the WPRAP D&D meets the requirements of the OU 5 ROD.
- 5) Commenting Organization: Ohio EPA Commentor: OFFO  
Section #: 2.3.1 Pg #: 6 Line #: last paragraph in section Code: c  
Comment: The text describes three different categories of debris to be generated: non-process debris, process debris and suspect prospect debris. Provide a list of materials which belong in each category.  
Similarly, the text states that the Material Segregation and Containerization Criteria forms identifies specific materials from the Project that are known to either meet or not meet the OSDF WAC. Provide a list of summarizing the information on the MSCC forms.

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The requests for the above information were made with the assumption that the information has already been compiled and is readily available. Please provide summary lists. It is not necessary to give us hundreds of MSCC forms.

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